

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

RICHARD ALEXANDER)
MURDAUGH, JR.,)
Plaintiff,)
v.)
BLACKFIN, INC., WARNER BROS.)
DISCOVERY, INC., WARNER)
MEDIA ENTERTAINMENT PAGES,)
INC., AND CAMPFIRE STUDIOS INC.,)
Defendants.)
Civil Action No.: 9:24-cv-04914-RMG
MOTION TO DISMISS OF
THE WARNER ENTITIES

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Warner Bros. Discovery, Inc. (“WBD”) and Warner Media Entertainment Pages, Inc. (“Warner Media Entertainment”) (collectively, with the corporate entities disclosed in the Amended Answer to Local Rule 26.01 Interrogatories, the “Warner Entities”)¹, respectfully move this court for an Order dismissing Plaintiff’s Amended Complaint. The basis for this Motion is that the Amended Complaint fails to state a claim upon which relief can be granted.

¹ The Warner Entities all join this Motion even though Plaintiff should have identified WarnerMedia Direct, LLC, Discovery Communications, LLC, and Discovery Digital Ventures, LLC, instead of WBD and Warner Media Entertainment for the reasons explained in the Amended Answer to Local Rule 26.01 Interrogatories (Dkt. 44) and based on the allegations of the Amended Complaint (none of which the Warner Entities concede). All of the Warner Entities reserve all rights and waive none by so doing.

This Motion is supported by applicable law, the Warner Entities' Memorandum of Law filed simultaneously herewith, and any additional supporting memoranda that may be submitted by the Warner Entities at or before any ruling on this Motion.

WHEREFORE, the Warner Entities respectfully requests that the Court enter an Order Dismissing Plaintiff's Amended Complaint.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

s/ MERRITT G. ABNEY

David E. Dukes, Esq. (Federal Bar No. 00635)
E-Mail: david.dukes@nelsonmullins.com
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

Merritt G. Abney, Esq. (Federal Bar No. 09413)
E-Mail: merritt.abney@nelsonmullins.com
151 Meeting Street / Sixth Floor
Post Office Box 1806 (29402-1806)
Charleston, SC 29401-2239
(843) 853-5200

WILLKIE FARR & GALLAGHER LLP

Meryl C. Governski, *admitted pro hac vice*
Kristin Bender, *admitted pro hac vice*
Willkie Farr & Gallagher LLP
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgovernski@willkie.com
kbender@willkie.com

*Attorneys for Defendants Blackfin, Inc., Warner Bros.
Discovery, Inc., Warner Media Entertainment Pages, Inc. and
Campfire Studios Inc.*

Charleston, South Carolina
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